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October 8, 2004

## **VIA ELECTRONIC FILING**

Ms. Marlene Dortch Secretary Federal Communications Commission 445 12<sup>th</sup> Street, S.W., Room TWB-204 Washington, DC 20554

Re: Ex parte, Inter-Carrier Compensation for ISP-Bound Traffic, CC Docket No. 99-68; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98; Core Communications Petition for Forbearance Under 47 USC 160(c) from Application of the ISP Remand Order, WC Docket No. 03-171

Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, CC Docket No. 01-338

AT&T Corp. Petition for Rulemaking To Reform Regulation Of Incumbent Local Exchange Carrier Rates For Interstate Special Access Services, RM Docket No. 10593

## Dear Ms. Dortch:

On Wednesday, October 6, 2004, Robert Quinn and the undersigned, representing AT&T, and David Lawson, Sidley Austin Brown and Wood, counsel to AT&T, met with Christopher Libertelli, Legal Advisor to Chairman Michael Powell, to discuss issues that are currently before the Commission in connection with the above-captioned proceedings. The positions discussed were consistent with AT&T's prior written comments and ex parte submissions in these proceedings. Specifically, AT&T requests that the Commission take no action to undermine its broad authority to effect comprehensive intercarrier compensation reform by limiting the scope of section 251(b)(5) to exclude ISP-bound calls.

In addition, AT&T urged the Commission to reject proposals by BellSouth and others that would deny the unbundling of DS1 and DS3 loops that lack TDM features, proposals that are based upon a flawed reading of the relief granted for high capacity loops in the Triennial Review Order. The Commission's clearly stated policy in the

Triennial Review Order is that such high capacity loops must be fully unbundled regardless of technology or customer class once a finding of impairment has been established.

Finally, AT&T urged the Commission to address our petition to reform interstate special access services as quickly as possible.

Consistent with Section 1.1206 of the Commission's rules, I am filing one electronic copy of this notice and request that you place it in the record of the above-captioned proceeding.

Respectfully submitted,

cc: C. Libertelli